

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-  
FLW-LHG  
MDL No. 2738**

***THIS DOCUMENT RELATES TO ALL CASES***

**CERTIFICATION OF MICHELLE A. PARFITT, ESQ.**

Michelle A. Parfitt, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Ashcraft & Gerel, LLP. I was appointed as Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.

2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Reply Brief to Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc.'s Memorandum of Law in Opposition to Plaintiffs' Motion to Exclude the Opinions of Robert Kurman, M.D.

3. Attached hereto as Exhibit A is a true and correct copy of Tiourin, et al., Tubal Ligation Induces Quiescence in the Epithelia of the Fallopian Tube Fimbria, *Reproductive Sciences*, 22(10):1262-1271 (2015).

4. Attached hereto as Exhibit B is a true and correct copy of National Cancer Institute, Statement on Chronic Inflammation, dated April 29, 2015.

5. Attached hereto as Exhibit C is a true and correct copy of Jia, et al, Inflammation is a key contributor to ovarian cancer cell seeding, *Scientific Reports* (2018) 8:12394.

6. Attached hereto as Exhibit D is a true and correct copy of Kurman, et al, Papillary Tubal Hyperplasia. The Putative Precursor of Ovarian Atypical Proliferative (Borderline) Serous Tumors, Noninvasive Implants and Endosalpingiosis, *Am J Surg Pathol*. 2011 Nov; 35(11): 1605–1614.

7. Attached hereto as Exhibit E is a true and correct copy of Deposition Exhibit 12 from the Deposition of Robert Kurman, M.D., dated April 2, 2019.

8. Attached hereto as Exhibit F is a true and correct copy of Deposition Exhibit 13 from the Deposition of Robert Kurman, M.D., dated April 2, 2019.

9. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: June 17, 2019

/s/ Michelle A. Parfitt  
Michelle A. Parfitt